

RECEIVED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE

Clerk, U.S. District Court
Eastern District of Tennessee

USA THORNBURG

name of plaintiff(s)

v. United States

Department of Energy

name of defendant(s)

Case No. 2:09-CV-164
(to be assigned by Clerk)

COMPLAINT

1. State the grounds for filing this case in Federal Court (include federal statutes and /or U. S. Constitutional provisions, if you know them):

Freedom of Information Act 5 USC sec 552 Appeal for

all agency records held by the Department of Energy on

the use, research, testing of non-lethal weapons on the human population and

2. Plaintiff, USA THORNBURG

resides at

301 North Main Street

street address

Greenville

city

Greene

county

TN

state

37743

zip code

telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

discharges
of HEU
onto the
human
population
for data
collection/
effects of
radiation
exposure.

3. Defendant, United States
Department of Energy (Robert James Esq.) lives at, or its
 business is located at Office of Chief Counsel PO Box 2001,
Oak Ridge, Anderson, Tennessee.
 city county state
37831. (865) 576 1212
 zip code

(if more than one defendant, provide the same information for each defendant below)

4. Statement of claim (state as briefly as possible the facts of your case. Describe how each defendant is involved. Also include the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

²⁰⁰⁹ Appeal Agency determination that no records exist as to
 the Department of Energy's use of nonlethal weapons on
 the human population and/or that no records exist as to
 the intentional (or unintentional) release of Highly
 Enriched Uranium (HEU) onto the human population (from
 the Erwin Nuclear Reprocessing Facility in Erwin, Tennessee,
 to test exposure of radiation, "human radiation experimentation"
 Because of cutbacks and funding to test such nonlethal
 weapons have been made public (see attachments) and
 the Dept of Energy's past history of human radiation
 experiments (see Department of Energy's website), Plaintiff
 files this Appeal for records ^{to include} the list of human subjects (complete and accurate)

5. Prayers for Relief (list what you want the Court to do):

- a. Immediate release of all records related to
nonlethal weapons testing (and/or collaborations) by Department
of Energy (See attached University of Bradford "History of Nonlethal
Weapons in 1990s, March 2007)
- b. _____
- c. Immediate release of all records related to
HEU discharges onto the human population
by Erwin Nuclear Reprocessing facility, Erwin, Tennessee.
- d. _____

I (We) hereby certify under penalty of perjury that the above petition is true to the best of my (our) information, knowledge, and belief.

Signed this _____ day of August, 2009.

[Signature]

signature of plaintiff(s)